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ROBERT HUNTER BIDEN

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

ROBERT HUNTER BIDEN, an
individual,

Plaintiff,

vs.

PATRICK M. BYRNE, an individual,
Defendant.

Case No. 2:23-cv-09430-SVW-PD

Hon. Stephen V. Wilson

DECLARATION OF BRYAN M. SULLIVAN IN SUPPORT OF PLAINTIFF ROBERT HUNTER BIDEN'S NOTICE OF MOTION AND MOTION FOR FURTHER SANCTIONS AGAINST DEFENDANT PATRICK M. BYRNE BASED ON THE COURT'S AUGUST 5, 2025 ORDER DECLINING TO GRANT DEFAULT JUDGMENT; CONTINUING TRIAL; AND REOPENING LIMITED DISCOVERY FOR PLAINTIFF

[Notice of Motion and Motion; Declaration of Richard Harpootlian; and [Proposed] Order filed and served concurrently herewith]

Date: September 22, 2025
Time: 1:30 p.m.
Dept.: Courtroom 10A

Complaint Filed: November 8, 2023
Trial Date: October 14, 2025

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DECLARATION OF BRYAN M. SULLIVAN

I, Bryan M. Sullivan, declare and state as follows:

1. I am a Partner within the law firm of Early Sullivan Wright Gizer & McRae LLP, attorneys of record for Plaintiff Robert Hunter Biden (“Plaintiff”) herein. I submit this declaration in support of Plaintiff’s Motion For Further Sanctions Against Defendant Patrick M. Byrne Based On The Court’s August 5, 2025 Order Declining To Grant Default Judgment; Continuing Trial; And Reopening Limited Discovery For Plaintiff. If called as a witness, I would and could testify to the matters contained herein.

2. Plaintiff and all of his legal counsel were ready, willing, and able to commence trial in this matter on July 29, 2025 as scheduled by the Court on March 17, 2025. Indeed, all six members of Plaintiff’s defense team (four attorneys and two paralegals) traveled to Los Angeles, California from the east coast, stayed in hotel rooms, and paid for meals and ride shares in anticipation of the July 29, 2025 trial. However, the July 29, 2025 trial was continued to October 14, 2025 for the reasons stated in the Court’s August 5, 2025 Order Declining To Grant Default Judgment; Continuing Trial; And Reopening Limited Discovery For Plaintiff (the “August 5 Order”). Plaintiff will have to incur those same travel charges for the October 14, 2025 trial date.

3. I am responsible for the billing of time and expenses on this matter and I have reviewed the expenses incurred for the week of July 28, 2025 to for myself and my colleague, Mr. Zachary Hansen, to travel from the east coast to Los Angeles, California for the July 29, 2025 trial. Those expenses are:

- a. \$2,646.15 in flights for myself and Mr. Hansen, including last minute flight changes
- b. \$619.89 in Uber Rides
- c. \$924.00 in meals
- d. \$214.60 in hotel costs

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4. On August 12, 2025, I sent an email to Michael Murphy, Esq. via email, as required by the Central District of California Local Rules and the Court's August 5, 2025 Order Declining To Grant Default Judgment; Continuing Trial; And Reopening Limited Discovery For Plaintiff (ECF No. 311) informing Mr. Murphy of the grounds for this Motion. Attached hereto as **Exhibit "A"** is a true and correct copy of that notice email. Mr. Murphy has not indicated whether he intends to oppose this application.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 25th day of August, 2025, at Roanoke, Virginia.

/s/ Bryan M. Sullivan
Bryan M. Sullivan